

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

COMMONWEALTH CARE
ALLIANCE, HEALTH CARE FOR
ALL, GLENN CRENSHAW, AND
PAULA CRENSHAW, individually
and on behalf of persons similarly
situated,

Plaintiffs

v.

ASTRAZENECA
PHARMACEUTICALS L.P.,
ASTRAZENECA PLC,
ASTRAZENECA US, ZENECA, INC.,
AND ZENECA HOLDINGS, INC.,

Defendants.

No. 05 CV 10-335-DPW

**MOTION TO EXTEND TIME FOR DEFENDANTS
TO RESPOND TO PLAINTIFFS' CLASS ACTION COMPLAINT**

NOW COMES THE DEFENDANTS, Astrazeneca Pharmaceuticals, LP, Astrazeneca, PLC, Astrazeneca US, Zeneca, Inc. and Zeneca Holdings, Inc.,¹ for the limited purpose of moving the Court for an extension of time for the Defendants to respond to Plaintiffs putative class action complaint to and including March 18, 2005. In support of its motion, Defendants state as follows:

On February 18, 2005, the Defendants removed this action to the United States District Court for the District of Massachusetts. Thereafter, during a telephone conversation on the

¹ Defendants hereby do not generally appear, but make only a limited appearance for purposes of seeking an extension of time. In so doing, the Defendants do not waive any objection to the Court's jurisdiction or other defenses.

evening of February 18, counsel for the Plaintiffs and counsel for the Defendants agreed that the Defendants would have until March 18, 2005 to respond to the complaint. The parties also agreed to a proposed schedule for anticipated motion practice in the case. Counsel for the Defendants prepared a draft stipulation, including a proposed briefing schedule, and the draft stipulation was provided to counsel for the Plaintiffs on Tuesday, March 22, 2005. On Wednesday, March 23, 2005, Mr. Peter L. Welsh of Ropes & Gray, LLP, counsel for the Defendants, telephoned Mr. Thomas Sobol, counsel for the Plaintiffs, who stated that he would review the stipulation and respond shortly. On Friday, March 25, 2005, Mr. Sobol wrote to Ropes & Gray to state that he would respond to the draft stipulation by today, Monday, March 28, 2005. Earlier today, Ropes & Gray attempted to reach Mr. Sobol and was informed that he is out of the office all day today. Attempts to reach Mr. David S. Nalvin, Mr. Sobol's colleague on the case, have been unsuccessful.

As set forth in more detail above, the Plaintiffs have agreed orally to the extension sought by this motion.

WHEREFORE, the Defendants respectfully request that the Court permit them an extension of the time to respond to the complaint to and including March 18, 2005.

Respectfully submitted,

ASTRAZENECA
PHARMACEUTICALS LP
ASTRAZENECA PLC
ZENECA, INC.
ZENECA HOLDINGS, INC.
By their attorneys,

“/s/”Harvey J. Wolkoff (BBO #532880)
ROPES & GRAY
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Boston, Massachusetts 02110-2624
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Dated: February 28, 2005

So ordered,

Hon. Douglas A. Woodlock, U.S.D.J.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served electronically pursuant to Fed. R. Civ. P. 5(b)(2)(D) or mailed pursuant to Fed. R. Civ. P. 5(b)(2)(B), by First Class Mail, postage prepaid, this 28th day of February, 2005, to the counsel of record for each party.

“/s/”Harvey J. Wolkoff (BBO #532880)
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